

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ROCK HILL DIVISION

INTERNATIONAL SAFETY ACCESS CORPORATION,	)	
	)	Civil Action No.: 0:09-CV-00315-MJP
	)	
Plaintiff,	)	<b>DEFENDANTS' MOTION: (A) TO</b>
	)	<b>PIERCE THE CORPORATE VEIL;</b>
v.	)	<b>AND (B) FOR DETERMINATION</b>
	)	<b>THAT ASSETS OF PLAINTIFF ARE</b>
INTEGRITY WORLDWIDE, INC., and	)	<b>NOT SUBJECT TO A SECURITY</b>
JOHN MELIC,	)	<b>INTEREST</b>
	)	
Defendants.	)	

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AND NOW COME Defendants Integrity Worldwide, Inc. ("IWW") and Jonathan J. Melic ("Mr. Melic") (collectively "IWW"), by and through their undersigned attorneys, and move this Court for: (A) an order piercing the corporate veil of Plaintiff International Safety Access Corporation; and (B) a determination that that — contrary to Plaintiff's assertions — its assets are not subject to a security interest. The bases for this Motion are fully set forth in the accompanying Memorandum in Support (with exhibits) which is appended hereto and incorporated herein by reference as if set forth at length.

BARNWELL WHALEY PATTERSON & HELMS,  
LLC

BY: /s John W. Fletcher  
Randell C. Stoney, Jr.  
John William Fletcher  
885 Island Park Drive (29492)  
P. O. Drawer H  
Charleston, SC 29402-0197  
(843) 577-7700  
Attorneys for Defendants/Counterclaimants

Charleston, South Carolina  
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